

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

**COUNTERCLAIM PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS
INCURRED TO OBTAIN COMPLIANCE WITH THE CONSENT DECREE**

Pursuant to this Court's first Order of Civil Contempt [ECF No. 299], and Order regarding Counterclaim Defendant Tonia Haddix's ("Haddix") violation of the Consent Decree and Second Order of Civil Contempt [ECF No. 309], Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (together, "Plaintiffs") respectfully move this Court for an award of attorneys' fees and other costs incurred in litigating Haddix's contempt, to which the Court has already found Plaintiffs entitled, in the following amounts:

Attorneys' Fees: \$155,269.50

Costs: \$8,341.53

This motion is supported and more fully described by the accompanying memorandum and supporting documentation.

Dated: April 4, 2022

Respectfully submitted,

/s/ Jared Goodman
JARED GOODMAN (#1011876DC)

PETA Foundation
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323.210.2266
Fax No: 213.484.1648
jaredg@petaf.org

POLSINELLI PC
JAMES P. MARTIN (#50170)
KELLY J. MUENSTERMAN (#66968)
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
314.889.8000
Fax No: 314.231.1776
jmartin@polsinelli.com
*Attorneys for Defendants/
Counterclaim Plaintiffs*

CERTIFICATE OF SERVICE

I certify that on April 4, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served to counsel of record, and was served by U.S. Mail to:

Tonia Haddix, lazyjet69@yahoo.com
12388 State Rd. CC
Festus, MO 63028
Appearing Pro Se

/s/ Jared Goodman